

**EXHIBIT B**

**(Proposed Order)**

<p><b>United States Bankruptcy Court</b>  <b>District Of New Jersey</b>  Caption In Compliance With D.N.J. LBR 9004-1</p> <p><b>DUANE MORRIS LLP</b>  <b>A Delaware Limited Liability Partnership</b>  Sommer L. Ross, Esq.  1940 Route 70 East, Suite 100  Cherry Hill, NJ 08003-2171  Telephone: (302) 657-4951  Email: SLRoss@duanemorris.com</p> <p>and</p> <p>Lawrence J. Kotler, Esq. (Admitted <i>Pro Hac Vice</i>)  30 South 17<sup>th</sup> Street  Philadelphia, PA 19103-4196  Telephone: (215) 979-1514  Email: LJKotler@duanemorris.com</p> <p><i>Counsel for WFCM 2016-C34 Medical Office  Buildings NJ NY FL, LLC</i></p>	
<p>In Re:</p> <p>Hajjar Business Holdings, LLC, <i>et al.</i>,<sup>1</sup></p> <p>Debtors.</p>	<p>CHAPTER 11</p> <p>CASE NO. 20-12465-JKS  (Jointly Administered)</p> <p>Hearing Date: January 31, 2023 at 10:00 a.m.</p> <p>Judge: Hon. John K. Sherwood</p>

<sup>1</sup> The debtors in these cases are: HMOB of Jersey City Owner, LLC, Case No. 20-12557-JKS; Hajjar Medical Office Building of Jersey City, LLC, Case No. 20-12472-JKS; HMOB of Wayne Owner, LLC, Case No. 20-12550-JKS; Hajjar Medical Office Building of Wayne, LLC, Case No. 20-12464-JKS; HMOB of Roseland Owner, LLC, Case No. 20-12552-JKS; Hajjar Medical Office Building of Roseland, LLC, Case No. 20-12466-JKS; HMOB of New Brunswick Owner, LLC, Case No. 20-12549-JKS; Hajjar Medical Office Building of New Brunswick, LLC, Case No. 20-12476-JKS; HMOB of Oradell Owner, LLC, Case No. 20-12551-JKS; Hajjar Medical Office Building, LLC, Case No. 20-12470-JKS; HMOB of Carlstadt Owner, LLC, Case No. 20-12553-JKS; Hajjar Medical Office Building of Carlstadt, LLC, Case No. 20-12467-JKS; HMOB of Hackensack Office Owner, LLC, Case No. 20-12555-JKS; Hajjar Medical Office Building of Hackensack, LLC, Case No. 20-12471-JKS; HMOB of Hackensack Warehouse Owner, LLC, Case No. 20-12556-JKS; Hajjar Warehouse of Hackensack, LLC, Case No. 20-12473-JKS; HMOB of Fair Lawn Owner, LLC, Case No. 20-12547-JKS; Hajjar Medical Office Building of Fairlawn, LLC, Case No. 20-12468-JKS; HMOB of Glen Rock Owner, LLC, Case No. 20-12545-JKS; Hajjar Medical Office Building of Glen Rock, LLC, Case No. 20-12469-JKS; HMOB of Fair Lawn 15-01 Broadway Owner, LLC, Case No. 20-12536-JKS; Hajjar Business Holdings, LLC, Case No. 20-12465-JKS; HMOB of Mt. Kisco Owner, LLC, Case No. 20-12540-

**ORDER GRANTING SECURED CREDITOR'S VERIFIED MOTION  
TO QUASH BANKRUPTCY RULE 2004 SUBPOENA ISSUED  
BY THE OWNER DEBTORS TO LNR PARTNERS, LLC**

The relief set forth on the following pages, numbered three (3), is hereby ORDERED.

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JKS; Hajjar Medical Office Building of Mount Kisco, LLC, Case No. 20-12474-JKS; HMOB of Miramar Owner, LLC, Case No. 20-12543-JKS; and Hajjar Medical Office Building of Miramar, LLC, Case No. 20-12475-JKS.

**THIS MATTER** having been opened to this Court by WFCM 2016-C34 Medical Office Buildings NJ NY FL, LLC, a Delaware limited liability company (“Secured Creditor”), by and through its counsel, upon the motion (the “Motion”)<sup>2</sup> for the entry of an order to quash a subpoena (the “Subpoena”) issued by the Owner Debtors to non-party LNR Partners, LLC pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure; and good and sufficient notice of the hearing on the Motion having been provided in accordance with the Federal Rules of Bankruptcy Procedure; and this Court having considered the moving papers, the opposition thereto, if any, and the arguments of counsel, if any; and good cause appearing for the entry of this Order,

**IT IS ORDERED** as follows:

1. The Subpoena is hereby quashed, and LNR Partners, LLC is under no obligation to produce a witness to testify in connection therewith or to produce the documents identified therein.
2. This Court shall retain jurisdiction over any and all matters arising from or related to the interpretation or implementation of this Order.

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.